

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 1625

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING
STIPULATION GRANTING BELKIS MILLAN RELIEF FROM THE
AUTOMATIC STAY TO PROCEED IN CIVIL ACTIONS**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On January 7, 2025, Belkis Millan (the “**Movant**”) filed the *Motion of Belkis Millan for Relief from the Automatic Stay* [D.I. 1625] (the “**Millan Lift Stay Motion**”) in the United States Bankruptcy Court for the District of Delaware (the “**Court**”).
2. The Movant filed the Millan Lift Stay Motion for the limited purposes to proceed in the Civil Action solely against the Debtors’ applicable insurance policies and proceeds thereof.

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

3. The Debtors and the Movant have engaged in good faith negotiations and have agreed to enter into a stipulation (the “**Stipulation**”) to effectuate lifting the automatic stay and resolve the Millan Lift Stay Motion.²

4. A copy of the Stipulation is attached as Exhibit A to the proposed form of order (the “**Proposed Order**”), attached hereto as Exhibit 1.

5. Counsel for the Movant has reviewed the Proposed Order and has agreed to its entry.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as Exhibit 1, at its earliest convenience.

[Signature page follows]

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

Dated: June 25, 2025
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Casey B. Sawyer

Robert J. Dehney, Sr. (No. 3578)
Andrew R. Remming (No. 5120)
Daniel B. Butz (No. 4227)
Sophie Rogers Churchill (No. 6905)
Casey B. Sawyer (No. 7260)
1201 N. Market Street, 16th Floor
Wilmington, DE 19801
Tel: (302) 658-9200
rdehney@morrisnichols.com
aremming@morrisnichols.com
dbutz@morrisnichols.com
srchurchill@morrisnichols.com
csawyer@morrisnichols.com

-and-

DAVIS POLK & WARDWELL LLP

Brian M. Resnick (admitted *pro hac vice*)
Adam L. Shpeen (admitted *pro hac vice*)
Stephen D. Piraino (admitted *pro hac vice*)
Ethan Stern (admitted *pro hac vice*)
450 Lexington Avenue
New York, NY 10017
Tel.: (212) 450-4000
brian.resnick@davispolk.com
adam.shpeen@davispolk.com
stephen.piraino@davispolk.com
ethan.stern@davispolk.com

Counsel to the Debtors and Debtors in Possession